

# Fact Sheet



## For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on May 23, 2017.

Permit Number: **R30-03300001-2017**  
Application Received: **August 13, 2020**  
Plant Identification Number: **03-54-033-00001**  
Permittee: **Amsted Graphite Materials LLC**  
Facility Name: **Anmoore Facility**  
Mailing Address: **P.O. Box 120**  
**Anmoore, WV 26323**

Permit Action Number: *MM01*      Revised: *May 18, 2021*

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Physical Location:                      Anmoore, Harrison County, West Virginia  
UTM Coordinates:                      561 km Easting • 4,345 km Northing • Zone 17  
Directions:                                Rt 58, Philippi Pike at Anmoore, WV.

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### Facility Description

This permit modification will make changes due to consolidation of permits R13-0874, R13-1151, R13-1540B, R13-2058C and R13-3039A into one permit which is R13-3039B.

### Emissions Summary

This modification results in the following emission changes:

Pollutant	Change in Potential Emissions	
	lb/hr	tpy
CO	-1.02	+1.96
NO <sub>x</sub>	-2.06	-2.59
SO <sub>2</sub>	-49.99	-6.63
PM	-1.22	-0.85

Pollutant	Change in Potential Emissions	
	lb/hr	tpy
VOC	-1.74	-0.81
HAPs	-0.74	-0.49

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 2,907.63 TPY of carbon monoxide (CO), 196.10 TPY of particulate matter (PM<sub>10</sub>), and 127.64 TPY of sulfur dioxide (SO<sub>2</sub>). Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Amsted Graphite Materials LLC (AGM) is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent And Control Particulate Air Pollution from Combustion Of Fuel In Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR7	To Prevent And Control Particulate Matter Air Pollution from Manufacturing Processes And Associated Operations
	45CSR10	To Prevent And Control Air Pollution from The Emission Of Sulfur Oxides
	45CSR11	Standby plans for emergency episodes
	45CSR13	Minor New Source Review Permits for Stationary Sources
	45CSR16	Standards of Performance for New Stationary Sources
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. 60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-3039B	December 11, 2020	
CO-R30-E-2020-5	May 26, 2020	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

### Determinations and Justifications

This Minor Modification is to make changes to the permit due to the consolidation of NSR permits (R13-0874, R13-1151, R13-1540B, R13-2058C, and R13-3039A) into R13-3039B. Changes also occur due to the following NSR permits being changed to inactive status: R13-0893, R13-1569A, R13-1934C, and R13-2047.

#### Section 1.1. Emissions Unit

- R13-3039A was issued to replace both upper plant boilers (existing EP-308 and EP-309) with a new Cleaver Brooks boiler (EP-308). The boiler was ordered and received but due to boiler building limitations, the building required modification and the installation has been delayed. One of the existing boilers (Ames Brand, EP-309) which was to be removed from service was repaired and continues to operate. The second boiler (existing EP-308) was removed from service and was removed from the plant. The current Title V permit shows three (3) plant boilers. AGM intends to install the Cleaver Brooks Boiler (EP-308) in 2021, but also wants to maintain the existing Ames boiler (EP-309) which earlier had been intended to be removed. R13-3039B addresses the need to maintain the existing Ames Boiler (EP-309) along with the Hurst Boiler (EP-301) installed in 2013 and the yet to be installed Cleaver Brooks boiler (EP-308). The grandfathered existing Cleaver Brooks Boiler (EP-300) will continue to operate.
- Minor changes were made to the emission unit descriptions and installation dates to resolve differences between the R13-3039B emission units table and the Title V emission units table for non-grandfathered equipment.
- Emission Point 055 with emission units 055, 055A, 055B, 055C, 055D, 055E, 055F, 055G, and 055H were removed from the Title V permit as this equipment has been removed from the facility.
- Emission Point 081 was previously in R13-2058C but was removed in the consolidation, since emission units 081A, 081B, 081C, and 081D were never installed.
- Emission units NC254 , NC255, NC256, and NC257 were removed because they were the cool down stacks for car bottom furnaces 081A, 081B, 081C, and 081D which were never installed.
- Emission Point 087 was removed as the utilities for this equipment have been disconnected and the equipment is inoperable.

- Emission Units 231A-231T, 232A-232T, 235A-235T, 233A-233F, and 236A-236F were included in NSR permit R13-1934C. Though R13-1934C was made inactive since the manufacturing process it permitted is no longer used, the emission units above remain in the Title V permit because they are grandfathered equipment used in other manufacturing processes at the facility.

### **3.0 Facility-Wide Requirements**

- Updated citations in the following requirements: 3.1.9, 3.1.10, 3.2.1, 3.3.2, and 3.4.1.
- Updates to permit shield condition 3.7.2 include incorporating the company name change and the return of the Ames Natural Gas Fired Boiler (309) to service.

### **4.0 Source-Specific Requirements for Boilers**

- Ames Natural Gas Fired Boiler (309) was returned to service and added back into the permit. Specific requirements for Boiler 309 were added to conditions 4.1.2, 4.1.3, 4.1.4, and 4.2.2.
- Condition 4.5.1. was removed since the “Initial Notification” requirement for boilers 301 and 308 has already been met.

### **5.0 Source-Specific Requirements for the Bake Process**

- Emission units removed from this section include: 081, 254, 255, 256, and 257.
- Updated the citations of the following conditions due to the consolidation of R13 permits into R13-3039B: 5.1.1 – 5.1.20, 5.1.22, 5.1.24, 5.1.25, 5.1.28, 5.1.30 – 5.1.35, 5.2.1, 5.2.2, 5.2.4, 5.3.2, 5.4.1, 5.4.2, 5.4.4, 5.4.5, 5.4.6 and 5.5.1.
- In condition 5.1.6, the number of furnaces was changed from seven to three.
- In conditions 5.1.10 and 5.2.1, the reference to Pre-Preg Carbon Paper was changed to Durez or equivalent material.
- Conditions 5.1.14, 5.1.16, 5.1.17, 5.1.18, 5.1.19, 5.1.20 and 5.2.1 had reference to HHN cement or cement changed to Durez material to reflect changes made in R13-3039B.
- Condition 5.1.21. was removed since the Carbon Foam Block process is no longer a product line and the underlying R13 permit condition was removed in permit consolidation R13-3039B.
- Revised conditions 5.2.4 and 5.4.2 to include changes from R13-3039B.
- Removed and reserved condition 5.3.1 since the underlying R13 requirement was not included in R13-3039B.

### **6.0 Source-Specific Requirements for the Pitch Impregnation Process**

- None of the equipment used in this process is covered under R13-3039B so no changes were made to this section.

### **7.0 Source-Specific Requirements for the Special Product, Rigid Graphite Insulation**

- Removed Porous Carbon from the section title line since the product is no longer produced at the facility and the R13 permit for the manufacturing process (R13-1569A) has been made inactive.
- Updated Conditions 7.1.1 and 7.1.2 to reflect changes made in the underlying R13 permit conditions.
- Updated condition 7.1.3 due to the equipment associated with Emission Point 055 being removed.

- Removed and reserved conditions 7.1.4, 7.1.6, and 7.4.2 since they were applicable requirements for the Porous Carbon Process which is no longer used and R13-1569A has been made inactive.
- Updated the citations of the following conditions due to R13 permit consolidation under R13-3039B: 7.1.1, 7.1.2, 7.1.3, 7.1.5, 7.1.7, 7.1.8, 7.1.9, 7.1.11, 7.2.3, 7.3.3, and 7.4.3.
- Removed condition 7.2.1 since it only applies to baghouses and there are no baghouses for the equipment left in section 7.0.
- Removed and reserved conditions 7.3.1., 7.3.2, and 7.5.2 since the cited underlying R13 conditions were not included in R13-3039B.
- Conditions 7.4.4 and 7.4.5 were removed from the permit since there is no air pollution control equipment in section 7.0.

#### **8.0 Source-Specific Requirements for Raw Materials Handling Operations**

- Removed Emission Point 087 from the section, since R13-2047 has been made inactive and its associated equipment removed from the permit. This includes the removal and reservation of conditions 8.1.1, 8.1.2, 8.2.2, and 8.2.3 which were requirements solely applicable to Emission Point 087. In condition 8.4.1, the reference to condition 8.1.2 was removed.

#### **9.0 Reserved.**

- All conditions in Section 9.0 were removed since they were associated with R13-1934C which was for the production of low ash graphite. R13-1934C was made inactive since the facility no longer makes low ash graphite.

#### **10.0 Source-Specific Requirements for the Graphite Machining and Materials Handling Process**

- None of the equipment used in this process is covered under R13-3039B so no changes were made to this section.

#### **11.0 Source-Specific Requirements for the Shipping and Quality Control Operations**

- None of the equipment used in this process is covered under R13-3039B so no changes were made to this section.

#### **12.0 Source-Specific Requirements for the Mill, Mix, and Forming Operations**

- Updated the citations of conditions 12.1.1 and 12.1.2 due to the consolidation of the underlying R13 permit into R13-3039B.
- Added conditions 12.4.7 and 12.4.8 since R13-3039B applies to BH-019, BH-032, and BH-015 and this equipment is located in section 12.0.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. 40CFR60 Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

Two of the four boilers have the following characteristics:

Cleaver Brooks Natural Gas Fired Boiler, constructed in 1981, Rated capacity of 11.0 MMBtu/hr, ID (300)

Ames Natural Gas Fired Boiler, constructed in 1960, Rated capacity of 13.0 MMBtu/hr, ID (309)

As a result of these boilers being constructed before the corresponding applicability date of June 9, 1989, the boilers listed above were found not to be subject to the above referenced NSPS.

**Request for Variances or Alternatives**

None.

**Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

**Comment Period**

Beginning Date: Not Applicable for minor modifications.  
Ending Date: N/A

**Point of Contact**

All written comments should be addressed to the following individual and office:

Robert Mullins  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/926-0499 ext. 41286  
Robert.A.Mullins@wv.gov

**Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Response to Comments (Statement of Basis)**

Not applicable.